

B20A (Official Form 20A) (Notice of Motion or Objection) (12/10)

EDVA (12/10)

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA**

Norfolk Division

In re: Willie Augusta Freeman)

)
)
) *[Set forth here all names including married, maiden, and*
) *trade names used by debtor within last 8 years.]*)

Case No. 11-74980

Debtor)

Chapter 13

Address 924 Marietta Avenue)
Norfolk, VA 23513)

)
)
) Last four digits of Social Security or Individual Tax-payer)
) Identification (ITIN) No(s)., (if any): 5910)

)
) Employer's Tax Identification (EIN) No(s). (if any):)
)

NOTICE OF MOTION (OR OBJECTION)

Debtor, by his Counsel, _____ has filed papers with the court to vacate the dismissal of
his Chapter 13 Bankruptcy.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion (or objection), or if you want the court to consider your views on the motion (or objection), then on or before _____, you or your attorney must:

- ☐ File with the court, at the address shown below, a written request for a hearing [or a written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for hearing (or response) to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

Clerk of Court
United States Bankruptcy Court

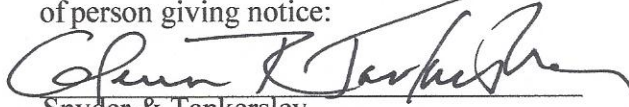
You must also mail a copy to:

- ☒ Attend a hearing to be scheduled at a later date. You will receive separate notice of hearing. **If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing**
- ☐ Attend the hearing on the motion (or objection) scheduled to be held on _____ at _____ m. at United States Bankruptcy Court, _____.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Date: December 1, 2011

Signature, name, address and telephone number of person giving notice:


Snyder & Tankersley
2006 Old Greenbrier Road, Suite 1E
Chesapeake, VA 23320
Virginia State Bar No. 16061
Counsel for Debtor, by his Counsel, _____

Certificate of Service

I hereby certify that I have this 1st day of December, 20 11, mailed or hand-delivered a true copy of the foregoing Notice of Motion (or Objection) to the parties listed on the attached service list.



UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Norfolk Division

In Re: Willie August Freeman
Debtor.

Case No: 11-74980
Chapter 13

Motion to Vacate Order of Dismissal

To the Honorable Stephen C. St. John, Judge:

COMES NOW the debtor, Willie August Freeman, by Counsel, in support of his Motion respectfully states as follows:

This case commenced upon the filing of a Voluntary Petition for Bankruptcy under Chapter 13 of Title 11 of the United States Bankruptcy Code in this Court on November 8, 2011. The Court entered an Order for Relief of that date.

The deadline for filing a Chapter 13 Plan was November 23, 2011, which was not timely filed. Counsel for Debtor had just changed employment status and opened a new office during the time the Plan was due. Because the computer equipment and software in the new office had not been fully installed, it was not possible to file the plan at that time.

On November 25, 2011, an Order of Dismissal was entered.

The failure to file a Plan was done unintentionally and was due to no fault of the debtor. The Debtor has been and is prepared to continue to pay his Plan payments as due.

WHEREFORE, the Debtor prays for the entry of an Order vacating the dismissal, respectfully requests a reinstatement of his Chapter 13 Bankruptcy, and that the Debtor's case be allowed to go forward, and that he be granted any other remedies the Court may deem appropriate.

Glenn R. Tankersley, Esquire
VSB #: 16061
Snyder & Tankersley
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Suite 1E
Chesapeake, VA 23320
ph 757-3351-2622
e-mail: glenn@snytan.hrcoxmail.com and glennrtankersley@cox.net

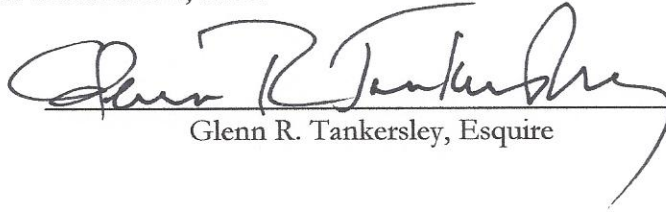
Willie August Freeman

By: 

Of Counsel

Certificate of Mailing

I hereby certify that a copy of the foregoing Motion was mailed to the debtor, U.S. Trustee, Interim Trustee, and all parties in interest on this December 1, 2011.


Glenn R. Tankersley, Esquire

Glenn R. Tankersley, Esquire
VSB #: 16061

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<p>Case 11-74980-SCS Atlantic Anesthesia 134 Business Park Drive Virginia Beach, VA 23462</p>	<p>Doc 13 Filed 12/01/11 Entered 12/01/11 13:35:37 Desc Main Document Page 5 of 5 Family First 425 W. Street Suite 1 Norfolk, VA 23517</p>	<p>Sentinel Collections 535 Independence Parkway Suite 700 Chesapeake, VA 23320</p>
<p>Bank of America PO Box 25118 Tampa, FL 33622</p>	<p>Firstsource Advantage 1232 W State Road La Porte, IN 46350</p>	<p>Vann Virginia Ctr for Orthopaedics 230 Clearfield Avenue Virginia Beach, VA 23462</p>
<p>Bon Secours 150 Kingsley Lane Norfolk, VA 23505</p>	<p>HRUBS PO Box 5912 Virginia Beach, VA 23471</p>	<p>Virginia Dept of Taxation Bankruptcy Unit P.O. Box 2156 Richmond, VA 23218-2156</p>
<p>Cardiology Consultants, Ltd 205 Business Park Drive Suite 200 Virginia Beach, VA 23462</p>	<p>ICS Capital PO Box 1826 Colleyville, TX 76034</p>	
<p>Check Smart 7001 Post Road Suite 300 Dublin, OH 43016</p>	<p>Internal Revenue Service P.O. Box 7346 Philadelphia, PA 19101</p>	
<p>Commonwealth Trustee, LLC 8601 Westwood Center Drive Suite 255 Vienna, VA 22182</p>	<p>MCM Dept 12421 PO Box 603 Oaks, PA 19456</p>	
<p>Credit Collections Srv. Po Box 9134 Needham, MA 02494</p>	<p>Midland Credit Mgmt In 8875 Aero Dr San Diego, CA 92123</p>	
<p>Dominion Power P.O. Box 26666 Richmond, VA 23261</p>	<p>Nationstar Mortgage Bankruptcy Department 350 Highland Drive Lewisville, TX 75067</p>	
<p>Dt Credit Co 7300 E Hampton Ave. Suite 101 Mesa, AZ 85209</p>	<p>Office of the US Trustee 200 Granby Street Suite 625 Norfolk, VA 23510</p>	
<p>Equidata 724 Thimble Shoals Blvd Newport News, VA 23606</p>	<p>Progressive Direct Insurance CCS PO Box 55126 Boston, MA 02205</p>	